

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OKLAHOMA**

1) VIDEO GAMING TECHNOLOGIES, INC., )  
  )  
  )  
  )  
Plaintiff, )  
  )  
  )  
v. ) Case No. 4:17-cv-00454-GKF-JFJ  
  )  
1) CASTLE HILL STUDIOS LLC )  
(d/b/a CASTLE HILL GAMING); )  
2) CASTLE HILL HOLDING LLC )  
(d/b/a CASTLE HILL GAMING); and )  
3) IRONWORKS DEVELOPMENT, LLC )  
(d/b/a CASTLE HILL GAMING) )  
  )  
Defendants. )

**PLAINTIFF'S NOTICE OF PROPOSED REDACTIONS TO DOCKET NO. 316**

Plaintiff Video Gaming Technologies, Inc. (“VGT”) hereby submits proposed redactions to the Court’s Order granting in part and denying in part VGT’s Motion to Exclude the Testimony of Robert Zeidman in Part (Dkt. No. 316) (the “Order”).

VGT requests only a single redaction, shown in yellow highlighting in Exhibit A hereto. Specifically, on page 9 of the Order, VGT seeks to redact part of a quotation of Mr. Zeidman’s report in which he discusses the contents of VGT’s source code, which is confidential and competitively sensitive information that VGT has designated as “Highly Confidential Source Code” under the Protective Order in this litigation. *See Decl. of Josh Davis (Dkt. No. 239) ¶ 11* (explaining that VGT’s source code is stored in a password-protected repository to which access is limited to persons under confidentiality obligations). Moreover, the limited information that VGT seeks to redact does not bear on the resolution of the motion to exclude. *See Deherrera v. Decker Truck Line, Inc.*, 820 F.3d 1147, 1162 n.8 (10th Cir. 2016) (granting motion to seal parts

of the record that “contain proprietary business information which is unnecessary to our disposition of this appeal”).

For these reasons, VGT respectfully requests that the Court maintain the Order under seal and apply VGT’s proposed redaction, as shown in Exhibit A hereto, to the public version of the Order.

June 19, 2019

Respectfully submitted,

/s/ Peter A. Swanson

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*Counsel for Video Gaming Technologies, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 19, 2019, I filed the foregoing Plaintiff's Notice of Proposed Redactions to Docket No. 316 via ECF, which caused a true and correct copy of the foregoing motion to be delivered to the following counsel:

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/s/ Peter A. Swanson

# **Exhibit A**

## **(Filed Under Seal)**